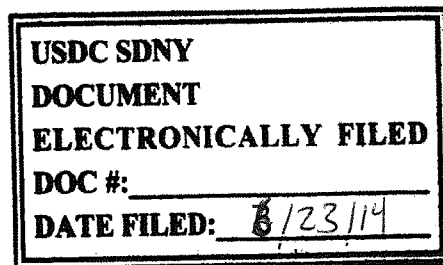




Yale Law School

MEDIA FREEDOM AND INFORMATION ACCESS CLINIC
INFORMATION SOCIETY PROJECT



June 20, 2014

VIA ELECTRONIC FILING

Honorable Analisa Torres
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

**Re: ACLU, *et ano* v. National Security Agency, *et al.*,
No. 13 Civ. 09198 (AT) (MHD)**

Dear Judge Torres:

We are counsel for Plaintiffs in the above-referenced Freedom of Information Act ("FOIA") lawsuit, and submit this letter on behalf of all parties.

As directed by the Court's so-ordering of an April 18 joint letter of the parties (Dkt. No. 27), the parties hereby request that the Court endorse this letter to set deadlines by when the defendant agencies are to complete any required review and processing of potentially responsive documents in connection with Plaintiffs' FOIA requests, as those requests have been modified or construed by so-ordered stipulation of the parties (Dkt. No. 30). The parties' agreed-upon deadlines are:

- By no later than **September 22, 2014**, defendant Federal Bureau of Investigation ("FBI") will complete the review and processing of potentially responsive documents it has located, with the exception of documents that require review by high-level FBI officials or by officials at agencies other than FBI. FBI will complete all review and processing by **December 22, 2014**.
- By no later than **September 22, 2014**, defendant National Security Agency will complete the review and processing of potentially responsive documents it has located, with the exception of the review and processing of quarterly reports to the Intelligence Oversight Board, which it will complete by **December 22, 2014**.
- By no later than **September 22, 2014**, all other defendants (except the Central Intelligence Agency ("CIA"), discussed below) will complete the review and processing of potentially responsive documents they have located.

Honorable Analisa Torres
June 20, 2014
Page 2 of 2

With respect to the CIA, whose search efforts remain underway, and are currently required by Court order to be completed by August 8, 2014, the agency will review and process all potentially responsive documents by **February 9, 2015**. Because CIA's search is not yet complete and the volume of responsive documents is uncertain, the parties have agreed that by **August 8, 2014**, CIA will describe to Plaintiffs the volume and nature of the documents it has located in response to the Request. By **August 15, 2014**, each party may propose to the Court a change to the deadline for CIA's review and processing to allow more or less time for processing in light of the results of CIA's search.

The parties understand that these deadlines may not be extended except upon a further application to the Court by the party or parties seeking additional time. We thank the Court for its consideration of this matter.

Respectfully submitted,




Jonathan M. Manes

cc: David Jones
Jean-David Barnea
Assistant United States Attorneys

Alexander Abdo, Esq.
Patrick Toomey, Esq.

SO ORDERED:

Dated: June 23, 2014
New York, New York



ANALISA TORRES
United States District Judge